

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

WARREN HILL, LLC, )

Plaintiff,) )

-vs-

) No. 2:18-01228-HB

SFR EQUITIES, LLC, )

Defendant.)

The VIDEOTAPED deposition of BRIAN HYNES, called by the plaintiff for examination, pursuant to notice and pursuant to the Rules of Civil Procedure for the United States District Courts, taken before Marcie A. Haw, CSR in and for the County of Cook and State of Illinois, on October 17th, 2018 at 200 South Michigan Avenue, Suite 1100, Chicago, Illinois.

1                   There were present at the taking of this  
2 deposition the following counsel:

3  
4                   ELLIOTT GREENLEAF, P.C., by  
                  MR. GREGORY VOSHELL  
5                   MR. LOUIS BALLEZZI  
                  925 Harvast Drive, Suite 300  
6                   Blue Bell, Pennsylvania 19422  
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7                   E-mail: Elliottgreenleaf.com  
8                               on behalf of the Plaintiff  
                  Warren Hill;

9  
10                  HOWARD AND HOWARD by  
                  MR. SCOTT LEVIN  
                  200 South Michigan Avenue, Suite 1100  
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12                  E-mail: Slevin@howardandhoward.com  
13                               on behalf of the Defendant  
                  Vendor Assistance Program and  
14                  Brian Hynes;

15                  WHITE & WILLIAMS by  
                  MR. MICHAEL N. ONUFRAK  
16                  1650 Market Street  
                  One Liberty Place, Suite 1800  
17                  Philadelphia, Pennsylvania 19103  
                  Phone: (215) 864-7174

18                               on behalf of the Defendant  
19                  SFR Equities;

20  
21                  ALSO PRESENT: Videographer, Jeff Wilhite.  
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## I N D E X

## WITNESS

Brian Hynes

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## E X H I B I T S

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Previously Marked Warren Hill No. 52 79

Previously Marked Warren Hill No. 5 88

Previously Marked Warren Hill No. 41 91

Hynes Deposition Exhibit No. 84 93

Hynes Deposition Exhibit No. 85 95

Previously Marked Warren Hill No. 22 97

Previously Marked Warren Hill No. 64 100

Previously Marked Warren Hill No. 65 102

Previously Marked Warren Hill No. 45 104

Hynes Deposition Exhibit No. 86 106

Hynes Deposition Exhibit No. 87 111

1 Bluestone Capital Markets, correct?

2 A. Correct.

3 Q. And that was -- That company was created in  
4 March of 2017, correct?

5 A. Sometime around there, yes.

6 Q. Could you please describe what, if anything,  
7 your role is with Bluestone Capital Markets?

8 A. Already have; manager.

9 Q. Fair point. From a day-to-day standpoint what  
10 do you do for Bluestone Capital Markets?

11 A. Whatever's asked of me.

12 Q. And what type of things are asked of you?

13 A. I can't think of anything right now.

14 Q. And to the extent that something was asked of  
15 you, who would do the asking?

16 A. Probably David Reape or Allen Wilson.

17 Q. Forgive me if we already touched on this, but  
18 David Reape is the CEO of Bluestone Capital Markets?

19 A. Yes.

20 Q. Does Mr. Harris have any position with  
21 Bluestone Capital Markets other than his role as a  
22 manager?

23 A. No.

24 Q. So if Mr. Harris was asking you to do